



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

AUG 05 2016

MEMORANDUM

SUBJECT: Review of a Compliance Inspection Report, for the February 23, 2011, inspection of Mycogen Seeds Quality Lab, 208 Leo Street, Marshalltown, Iowa, 50158.
RCRA ID Number: IAR000500439

FROM: Rebecca Wenner, Physical Scientist *RW*
Waste Enforcement and Materials Management Branch

THRU: Mary Goetz, Branch Chief
Waste Enforcement and Materials Management Branch

TO: File

The purpose of this memorandum is to document the review of the Resource Conservation and Recovery Act Compliance Evaluation Inspection report for the above-listed facility. The review was conducted by the Waste Enforcement and Materials Management Branch for purpose of closing out this CEI.

The CEI was conducted by a contractor of the U.S. Environmental Protection Agency on February 23, 2011. The CEI included review of the facility files, visual inspection of the facility, and interviews of facility personnel. During the CEI, violations were found at the facility; see the enclosed List of Violations. A copy of the CEI report has been sent to the facility.

I reviewed the CEI report and the facility's March 7, 2011, response to the Notice of Preliminary Findings and determined that there are no outstanding violations of state and federal hazardous waste laws. Due to the length of time since the CEI, and the fact that the facility ceased operations in February 2012 according to RCRA Info, no follow-up inspection is being requested.

If you have any questions regarding this action, please contact me at extension 7644.

RCRA



Printed on Recycled Paper

List of Violations

Mycogen Seeds Quality Lab
208 Leo Street, Marshalltown, Iowa, 50158.
RCRA ID Number: IAR000500439

Violation 1 – 40 CFR 273.14(e) – Failure to mark waste lamp with the following “universal waste-lamps” or waste lamps” or “used lamps”.

Violation 2 – 40 CFR 273.15(c) – Failure to track accumulation time of universal waste lamps.

Violation 3 – 40 CFR 262.34(d)(5)(ii)(A) – Failure to post the name and telephone number of the emergency coordinator next to telephones.

Violation 4 – 40 CFR 262.34(d)(5)(ii)(B) – Failure to post the location of spill control material next to telephones.

Violation 5 – 40 CFR 265.173(a) – Failure to store hazardous waste in a closed container.

Violation 6 - 40 CFR 265.37(a)(4), 265.37(a)(1) – Failure to make arrangements with emergency response organizations.